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FAA-2001-11097-5

**BUSINESS JET SERVICES**

February 18, 2002

U.S. Department of Transportation  
Docket Management System  
400 7<sup>th</sup> Street, S.W. Room PL 401  
Washington, D.C. 20591-0001

Re: Docket No. FAA.-2001-11097

02 FEB 27 AM 9:06

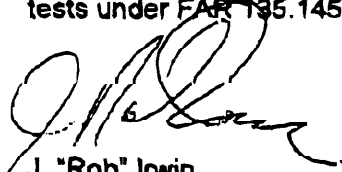
DEPT OF TRANSPORTATION  
FAA

To Whom It May Concern:

Pursuant to DOT/FAA Summary Notice No. DE 2002 11, Business Jet Services, Ltd. submits the following comments.

1. The relief sought is to preclude further proving tests over and above the more than 100 hours of proving flight already conducted. The description of relief sought reflected in the Summary Notice indicates that Business Jet Services, Ltd. requests relief from all proving flights, which is not the case.
2. The costs of proving flights already conducted, is approximately \$225,000.00. Further delay on the petition will adversely affect Business Jet Services, Ltd. by increasing these costs; without improving safety.
3. Further delay will continue to adversely affect the traveling public through lack of availability of on demand air transportation.
4. The Notice of Proposed Rule Making regarding fractional ownership supports relief from proving flight requirements.
5. Many companies routinely operate Turbo-jet airplanes under CFR 14 Part 91 without conducting proving tests. The same level of safety is achieved.

We believe the safety level and policy criteria for an exemption from additional proving tests under FAR 135.145 have been met



J. "Rob" Irwin  
Director of Operations